

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

21 Civ. 6995 (PKC)

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

**DECLARATION OF JAMES HICKEY, ESQ.,
FORMER COUNSEL TO THEIA GROUP, INC.**

I, James Hickey, Esq., declare:

1. I am former counsel to Theia Group, Inc. (“TGI,” and together with Theia Aviation LLC, and Theia Holdings A, Inc., the “Receivership Entities”).

2. I submit this Declaration in further support of the *Receiver’s Memorandum of Law in Response to Stephen Buscher’s Limited Objection and Reservation of Rights to the Expedited Motion of Receiver for an Order Further Extending the Stay Provided in the Receivership Order*.

3. On Friday, May 6, 2022, I received a text message from Stephen Buscher in which he implied that he had the ability to cause criminal charges to be filed against me. That text message, a copy of which is attached as Exhibit 1 hereto, states as follows:

Hi Jim, you do know that framing or slandering me will bring extra criminal charges, no?

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 26, 2023

By: /s/ James Hickey
James Hickey, Esq.